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Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MANUEL LITUMA,

Plaintiff,

-against-

EMPIRE STATE PROPERTIES, INC., and LEFRAK
ORGANIZATION, INC.,

Defendants.

Case No.:
07-CV-01649 (AKH)

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 10, 2007

Yours etc.,

HARRIS BEACH PLLC



Brian A. Bender, Esq. (BAB-0218)

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Attorney for Defendant

LEFRAK ORGANIZATION, INC.

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